



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 24, 2021

VIA ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Abduraman Iseni, et al.*, 20 Cr. 660 (ALC)

Dear Judge Carter:

The Government, after conferring with and receiving no objections from defense counsel, respectfully writes to provide the Court with a joint status report in the above-referenced case.

The Government has produced voluminous discovery in this case, and is continuing to produce relevant materials on a rolling basis. The Government has produced the large majority of Rule 16 materials, and is continuing to produce all Rule 16 materials in its possession. The Government has also engaged in plea discussions with the defendants, and expects to reach dispositions with a number of defendants. The Government respectfully requests that the Court schedule a status conference, or alternatively order that the parties provide another joint status report, for approximately 90 days from now, so that the Government can continue to produce discovery, defendants can review those materials, and the parties can continue to discuss potential pre-trial resolutions. The Government has informed all defense counsel of this proposed approach; no defense attorney has objected.

The Government also respectfully applies to the Court to exclude time to the newly scheduled date, in the interests of justice, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161, because such an exclusion is appropriate given the large number of defendants and voluminous discovery productions, and is necessary to allow defense counsel the opportunity for effective preparation and to discuss potential pre-trial dispositions. The Government has also asked defense counsel their position on the exclusion of time; no defense attorney has objected.

The Government is available to answer any questions the Court may have.

Very truly yours,

AUDREY STRAUSS
United States Attorney

by: /s/
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Assistant United States Attorneys
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cc: All Defense Counsel (by ECF)